

1.0 - PURPOSE AND ORGANIZATION



PURPOSE:

The purpose of these instructions is to serve as a desktop reference for each Department of Toxic Substances Control (Department) permit writer that is required to review and approve a treatment and/or storage (T&S) closure plan. It is noted that these instructions focus specifically on treatment/storage facilities that plan to "clean" close. Previous guidance written by the Department covered all types of closures such as land disposal, waste piles, land treatment, incinerators and open burn/open detonation. These instructions should answer the following basic questions:

1. What are the steps (procedures) that should be followed in reviewing and approving a treatment/storage facility closure plan?
2. Who is responsible for each step?
3. When should each step take place?
4. What is included in each portion of the plan?
5. What happens after a closure plan is approved?

At this point it is important to clarify what these instructions are not:

- * A guidance manual to owners or operators on how to prepare a closure plan.
- * A complete reference summary of all technical guidance written on the subject of clean closure.

As with any desktop reference staff are encouraged to insert update guidance (policy memos, profs notes, etc.) that pertain to each step. The Department also plans to maintain these instructions by holding quarterly meetings of supervisory staff to review/update it.

These instructions are limited to review of closure plans for treatment/storage facilities. Most of these facilities plan to "clean" close when they either cease operations or revert to generator status. It is an exceptional situation for a treatment and storage facility to know in advance that they will leave hazardous wastes in the soil or groundwater thus subjecting them to post-closure regulations. Guidance on the subject of post-closure (i.e., "non-clean closure") is not provided and staff must use available guidance which has not been included in these instructions.

These instructions are to be used by the permit writer in the following situations:

1. During the review of the closure plan section of a Part B permit application. Note: the Permit Writers Instructions, Chapter 9.9 refers to these instructions for guidance.
2. An interim status facility has decided to cease operations or revert to generator status.
3. The facility has been forced to submit a closure plan for the Department's review via an enforcement order. This is usually in response to a violation of an interim status document.
4. A facility has decided to substantially change their already approved closure plan.

It should be noted that California Code of Regulations (CCR), Title 22, Section 66265.112(d)(1) was revised in July 1991 wherein a T&S facility with interim status is no longer required to submit a closure plan for the Department's review/approval if the closure is partial. A closure plan is required to be submitted only if all or the remaining treatment and storage units are being closed. This closure plan must address both previously closed and

remaining to be closed treatment and storage units. Partial closure plans must still be submitted for the Department's review for surface impoundments, waste piles, land treatment units and landfills.

HOW THESE INSTRUCTIONS ARE ORGANIZED:

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| Chapter 1 - | This chapter describes when these instructions should be used, i.e., for what type of closures, why these instructions were written, and how it should be used. |
| Chapter 2 - | The overall treatment and storage closure process is described in a stepwise fashion so that staff are aware of what must be done, when and by whom. This includes the California Environmental Quality Act (CEQA) review which should occur concurrently with the closure plan review. |
| Chapter 3 - | This describes what information should be included in a T&S closure plan. |
| Chapter 4 - | This chapter provides guidance on what procedures must be followed once it has been determined that the closure plan is technically adequate and CEQA has been completed. |
| Chapter 5 - | Once the final closure plan is approved, this chapter details what the Department's involvement should be while the facility is implementing the approved closure plan. |
| Chapter 6 - | Upon completion of the implementation of the closure plan, this chapter details what should be submitted to the Department for approval of the facility's closure certification. |

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List of Examples:

List of Attachments:

List of References: